

## **MEMO ENDORSED**

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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/14/2021

May 14, 2021

VIA ECF ONLY

Honorable Valerie E. Caproni Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

RE: Avrohom Manes v. Trans Union, LLC, et al.

U.S. District Court, Southern District of New York

Case No.: 7:20-cv-11059-KMK

Dear Judge Caproni:

We are counsel for Trans Union, LLC ("Trans Union") in the above-referenced matter. We respectfully request that the Court reschedule the Initial Conference set for June 4, 2021 at 10:00 a.m. A Mediation in the Sixth Circuit is scheduled for that date that requires the participation of Trans Union's undersigned counsel.

There have been no previous requests for adjournment and all other parties consent to this request. All counsel are available the morning of June 7, 2021 and anytime on June 8 through June 10, 2021 to reschedule the Initial Conference.

In addition, we respectfully request leave of Court for Trans Union's counsel to participate by telephone in the Initial Conference. Due to the ongoing Covid-19 pandemic and the ever-changing health and travel restrictions and guidelines, good cause exists to grant Trans Union leave to appear by telephone rather than be required to travel from Zionsville, Indiana to New York. Counsel for the Plaintiff and co-defendants have asked to be included in that request.

Trans Union assures the Court that counsel can and will meaningfully participate by telephone in all respects as may be necessary.

Application GRANTED. The conference is adjourned to **June 11, 2021 at 10:00 a.m.** The parties must appear for the conference by dialing (888) 363-4749, using the access code 3121171 and the security code 1059. The parties' joint submission is due by June 3, 2021.

SO ORDERED.

Respectfully submitted,

SCHUCKIT & ASSOCIATES, P.C.

Camille R. Nicodemus

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE

CRN/kk